

SAMPLE ENVIRONMENTAL ASSESSMENT FOR IMPLEMENTATION OF AN INTEGRATED
CULTURAL RESOURCE MANAGEMENT PLAN FOR
[Installation]

Prepared for the

[Installation]

by

[Insert Name of Individual and Company Name]

(Date)

ENVIRONMENTAL ASSESSMENT ORGANIZATION

This Environmental Assessment (EA) evaluates the environmental effects of the [Installation] proposed action to implement an Integrated Cultural Resource Management Plan (ICRMP) for its federally funded or licensed facilities within the state of [insert State].

An **EXECUTIVE SUMMARY** briefly describes the proposed action, environmental conditions and consequences.

- SECTION 1.0** **PURPOSE AND NEED** summarizes the purpose of and need for the proposed action and describes the scope of the environmental impact analysis process.
- SECTION 2.0** **DESCRIPTION OF THE PROPOSED ACTION** describes the proposed action to implement the ICRMP for the State facilities.
- SECTION 3.0** **ALTERNATIVES CONSIDERED** examines alternatives for implementing the proposed action.
- SECTION 4.0** **ENVIRONMENTAL CONDITIONS** describes the existing environmental conditions at the installation that may be affected by the implementation of the ICRMP.
- SECTION 5.0** **FINDINGS AND CONCLUSIONS** identifies potential effects associated with the alternatives and draws a conclusion as to which alternative should be implemented.
- SECTION 6.0** **AGENCIES AND PERSONS CONSULTED** provides a listing of agencies and persons consulted during the preparation of the EA.
- SECTION 7.0** **LIST OF PREPARERS** identifies persons who prepared the documents and their areas of expertise.
- SECTION 8.0** **REFERENCES** provides bibliographical information for cited sources.
- APPENDICES** Agency Scoping Letters and other information pertinent to the analyses.

An **ACRONYMS AND ABBREVIATIONS** list is provided immediately following the table of contents.

ENVIRONMENTAL ASSESSMENT

for

IMPLEMENTATION OF AN INTEGRATED CULTURAL RESOUCCE
MANAGEMENT PLAN FOR

[Installation]

(List facilities)

Prepared by:

Prepared for:

[Installation]

(Name and Title)

(Name and Title)

Recommended for Approval by:

[Insert Installation Commander's Name]

(Name and Title)

EXECUTIVE SUMMARY

INTRODUCTION

This environmental assessment evaluates the potential environmental effects that would occur as a result of the following proposed action: implementation of an Integrated Cultural Resources Management Plan (ICRMP) to establish a uniform policy for comprehensive management of cultural resources located on [Installation] within the State of [insert State]. Army Regulation 200-4 requires all installations with cultural resources to prepare and implement an ICRMP. [Installation] does not now have an ICRMP to manage these resources.

PROPOSED ACTION

[Installation] proposes to adopt and implement an ICRMP to provide an integrated and comprehensive method for managing cultural resources on lands within the boundaries of, or under the control of, [Installation] within the State of [insert State]. The proposed action defines roles and responsibilities for cultural resources management at all levels within the [Installation] and provides a rational, tiered, and uniform basis for addressing all applicable legal requirements and best management practices consistent with achievement of the needs, goals, and objectives of the [Installation] military mission.

ALTERNATIVES

The "No Action Alternative" is the only alternative to the proposed action considered in this environmental assessment (EA) and serves as a benchmark against which the proposed action can be evaluated. For this analysis the status quo involves the management of [Installation] cultural resources within the State of [insert State] under existing procedures as required in compliance with the National Historic Preservation Act, as amended, and implementing procedures 36 CFR §800. Existing [Installation] cultural resource management procedures may not be, in all instances, compliant with legal, regulatory, and MACOM guideline requirements and they have not been compiled in an ICRMP as required by AR 200-4.

ENVIRONMENTAL CONSEQUENCES

This EA analyzes direct and indirect environmental effects. The potential for cumulative effects is also addressed and mitigation measures are identified where appropriate.

Implementation of the ICRMP would set up a formal mechanism for the [Installation] to manage and identify cultural resources on installation lands within the State of [insert State]. As a result of examination for applicability to the proposed action, implementation of the [Installation] ICRMP has been determined not to bear on certain resource areas that frequently receive attention in NEPA analyses. Resource areas that were considered but excluded from further detailed analysis in this EA include: climate, air quality, noise, geology (except soils), infrastructure (potable water supply, electricity, wastewater treatment, steam and process heat, telecommunications, solid waste disposal, vehicular traffic), groundwater, hazardous waste site

contamination and cleanup. In particular, socioeconomic effects associated with the proposed action (with the exception of the Environmental Justice and Protection of Children) are not analyzed because no measurable changes in local or regional employment or other economic indicators would be expected from implementation of the ICRMP.

Evaluation indicates that implementation of the ICRMP would result in beneficial effects in all instances for the following resources. Continuation of existing management procedures, the "no action" alternative, has the potential to result in adverse impacts to each of these resource areas.

- *Land Use*
- *Soils*
- *Surface Water*
- *Biological Resources*
- *Cultural Resources*
- *Environmental Justice*
- *Protection of Children*

MITIGATION

No mitigation measures will be required as a result of implementing the ICRMP for [Installation] within the State of [insert State]. Individual projects undertaken at a later date in compliance with the procedures outlined in the ICRMP may result in actions that could require mitigation measures. Appropriate mitigation measures will be identified and implemented at that time, as warranted.

CONCLUSIONS

In consideration of the integrated long-term planning approach of the [Installation] ICRMP, it is anticipated that significant impacts to air, land, water, esthetic, socioeconomic, natural and cultural resources will be avoided. The prescribed management and compliance actions presented in the [Installation] ICRMP stress the complete integration of all categories of cultural resource management with ongoing [Installation] plans and operations. Such comprehensive planning will serve to preclude any significant environmental impacts that may result from cultural resources management actions on [Installation] lands within the State of [insert State]. Accordingly, a finding of no significant impact (FONSI) is appropriate under the National Environmental Policy Act (NEPA) and its implementing regulations (40 CFR 1500-1508).

TABLE OF CONTENTS

SECTION 1.0

PURPOSE OF AND NEED FOR THE PROPOSED ACTION

- 1.1 INTRODUCTION
- 1.2 PURPOSE AND NEED
- 1.3 SCOPE
- 1.4 AGENCY AND PUBLICATION PARTICIPATION

SECTION 2.0

DESCRIPTION OF THE PROPOSED ACTION

- 2.1 PROPOSED ACTION

SECTION 3.0

ALTERNATIVES CONSIDERED

- 3.1 NO ACTION ALTERNATIVE

SECTION 4.0

ENVIRONMENTAL CONDITIONS AND CONSEQUENCES

- 4.1 INTRODUCTION
- 4.2 PROGRAM RESOURCE AREAS
 - 4.2.1 LAND USE
 - 4.2.2 SOILS
 - 4.2.3 SURFACE WATER
 - 4.2.4 BIOLOGICAL RESOURCES
 - 4.2.5 CULTURAL RESOURCES
 - 4.2.6 ENVIRONMENTAL JUSTICE
 - 4.2.7 PROTECTION OF CHILDREN

SECTION 5.0

FINDINGS AND CONCLUSIONS

- 5.1 INTRODUCTION
- 5.2 LAND USE
- 5.3 SOILS
- 5.4 SURFACE WATER
- 5.5 BIOLOGICAL RESOURCES
- 5.6 CULTURAL RESOURCES
- 5.7 ENVIRONMENTAL JUSTICE
- 5.8 PROTECTION OF CHILDREN
- 5.9 CUMULATIVE EFFECTS
- 5.10 MITIGATION MEASURES
- 5.11 CONCLUSIONS

SECTION 6.0

AGENCIES AND PERSONS CONSULTED

SECTION 7.0

LIST OF PREPARERS

SECTION 8.0

REFERENCES

APPENDICES

FIGURES

ACRONYMS AND ABBREVIATIONS

AR	Army Regulation
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
EA	Environmental Assessment
EIS	Environmental Impact Statement
FNSI	Finding of No Significant Impact
ICRMP	Integrated Cultural Resource Management Plan
NEPA	National Environmental Policy Act
NOI	Notice of Intent
POC	Point of Contact
ROI	Region of Influence
RSC	Regional Support Command
TCP	Traditional Cultural Property

1.0 PURPOSE OF AND NEED FOR THE PROPOSED ACTION

1.1 INTRODUCTION

This environmental assessment (EA) is prepared in accordance with the National Environmental Policy Act (NEPA) 42 USC 4321-4370c, its implementing regulations published by the Council on Environmental Quality (40 CFR 1500-1508), and the Department of the Army's Regulation (AR) 200-2 "Environmental Effects of Army Actions." NEPA, 40 CFR 1500-1508, and AR 200-2 collectively establish a process by which [Installation] considers the potential environmental impacts of its proposed actions and invites the involvement of interested members of the public prior to deciding on a final course of action.

The Department of the Army, through regulation AR 200-4, requires all Army installation's to prepare an Integrated Cultural Resource Management Plan (ICRMP). An ICRMP is an internal Army compliance and management plan that integrates the entirety of installation cultural resource requirements with ongoing mission activities, allows for ready identification of potential conflicts between an installation's mission and cultural resources, and identifies compliance actions necessary to maintain the availability of mission essential properties and acreage. ICRMP's are to receive an internal review annually and be updated at least every five years. ICRMP's will replace all Historic Preservation Plans or Cultural Resource Management Plans previously prepared in accordance with AR 420-40. AR 200-4 has superseded AR 420-40.

This EA, by setting forth and analyzing relevant environmental issues and impacts and considering the comments of the public, will provide the basis upon which the [Installation] will determine whether the proposed action may present significant impacts, in which case the [Installation] will prepare and publish a Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS).

1.2 PURPOSE AND NEED

There is a compelling need and regulatory requirement (AR 200-4) for the [Installation] to prepare a management plan that will outline an integrated approach to identify and comprehensively manage those cultural resources under its control. No such plan now exists for the management of [Installation] cultural resources within the state of [insert State].

The purpose of the proposed action is to implement an ICRMP for the management of cultural resources located on (name of installation, County, State) that ensures compliance with all applicable cultural resource management legal requirements including Federal statutes, regulations, Executive Orders, Presidential Memoranda, and U.S. Army guidelines. The ICRMP must set out procedures to integrate these legal compliance requirements into the day-to-day operational procedures of the [Installation] headquarters and its subordinate facilities. The ICRMP is intended to identify both internal and external [Installation] coordination procedures to deal with cultural resource issues and the appropriate roles and responsibilities of [Installation] personnel in the management of cultural resources.

1.3 SCOPE

This environmental assessment assesses the environmental impacts of implementing an ICRMP for the [Installation] and its subordinate facilities, to include (name of facilities addressed by the ICRMP). This EA does not purport or attempt to provide a quantitative analysis of the site-specific impacts associated with individual projects that will be implemented during the five-year period covered by the ICRMP. Consideration of site specific impacts will be undertaken at a second level of decision making by [Installation] commanders who will, consistent with NEPA and other applicable statutes and regulations, make an independent determination of the scope and level of additional documentation, if any, that may be necessary, prior to proceeding with specific projects or training activities that may affect cultural resources. This EA's analyses will be restricted to providing a qualitative environmental impacts evaluation and analysis of impacts on cultural resources (as defined in AR 200-4) in accordance with 40 CFR 1508.27(b) (3), (8) and (10), at the installation level.

This EA will consider, compare and evaluate two alternatives. The first alternative is the "No Action" alternative which would continue the status quo: continued management of cultural resources under the existing [Installation] management system. The second alternative, which serves as the Army preferred alternative, is the adoption and implementation of an ICRMP for (name of the installation to be included in the ICRMP).

1.4 AGENCY AND PUBLIC PARTICIPATION

Agency and public participation in the NEPA process promotes better decision making and open communication between the public and government. All persons and organizations having a potential interest in the proposed action, including minority, low-income, disadvantaged, and Native American groups, are urged to participate in the decision-making process. Copies of agency scoping letters are presented in Appendix A.

Public participation opportunities, with respect to the proposed action that is the subject of this EA, are guided by AR 200-2, *Environmental Effects of Army Actions*, and by MACOM guidance. The final EA and, if appropriate, a Finding of No Significant Impact (FNSI) will be made available to the public. The [Installation] will then observe a 30-day comment period, during which time any further comments submitted by agencies, organizations, or members of the public on the proposed action will be considered.

2.0 DESCRIPTION OF THE PROPOSED ACTION

2.1 PROPOSED ACTION

In accordance with AR 200-4, all Army installations, activities, and sites supported with federally appropriated funds or subject to Federal approval must prepare an ICRMP. A variance to this requirement is granted only when comprehensive survey efforts have found that a facility possesses no or only limited cultural resources and that preparation of an ICRMP would be of little or no value. Following an intensive review of all [Installation] lands within the State of [insert State], it was determined that due to the potential for unknown cultural resources on installation lands within [insert State], that all installation lands require cultural resources management oversight. It has also been determined that additional studies will be necessary to complete the cultural resource inventory for [Installation] lands and/or facilities within the state of [insert State]. Therefore, the [Installation] must prepare an ICRMP for the management of cultural resources at (name the appropriate facilities), within the state of [insert State].

In accordance with recommendations issued by the MACOM, a single ICRMP may be prepared that would include management recommendations for all [Installation] lands within the state of [insert State]. Since all [Installation] lands are usually centrally managed from (name the installation Headquarters and location), share a common chain of command, and have a single point of contact (POC) responsible for cultural resource management, the preparation of a single ICRMP for all installation-controlled lands would be more efficient than producing separate documents with redundant information.

The proposed action is, therefore, the adoption and implementation of an ICRMP by the [Installation] to provide an integrated and comprehensive method for managing cultural resources on lands owned or controlled by the [Installation] at (name the appropriate facilities). The proposed action defines roles and responsibilities for cultural resource management at all levels within the [Installation] and provides a rational, tiered, and uniform basis for addressing all applicable legal requirements and best management practices consistent with achievement of the needs, goals, and objectives of the [Installation] military mission.

3.0 ALTERNATIVES CONSIDERED

The proposed action presented in Section 2.0 is the MACOM preferred alternative. Preparation of and full implementation of the ICRMP is an Army regulatory requirement (AR 200-4), so other alternatives, including partial implementation of the ICRMP, were considered but were dismissed as being infeasible or impracticable.

3.1 NO ACTION ALTERNATIVE

The "No Action Alternative" is the only alternative to the proposed action considered in this EA. Inclusion of the no action alternative is prescribed by the President's Council on Environmental Quality (CEQ) regulations (40 CFR 1502.14). The no action alternative reflects the status quo and serves as a benchmark against which Federal actions can be evaluated. For this analysis, the status quo involves the management of cultural resources at [Installation] facilities within the state of [insert State] under existing procedures. The existing procedures do not clearly delineate the internal process whereby cultural resource management concerns and requirements will be integrated into the day-to-day operation of [Installation] facilities. As a result, cultural resources are often managed and administered on an ad hoc approach due to the dearth of specific guidance and standard operating procedures. Also, existing [Installation] cultural resource management operating procedures do not take into account a number of issues resulting from revised or recently issued Federal regulations, Executive Orders, and Presidential Memoranda concerning the management of cultural resources and interaction with Native American groups. The [Installation] does not now have an ICRMP as required by AR 200-4.

4.0 ENVIRONMENTAL CONDITIONS

4.1 INTRODUCTION

Section 4.0 describes the environmental and operational baseline conditions that exist at this time at [Installation] facilities within the state of [insert State], without implementation of the ICRMP.

As a result of examination for applicability to the proposed action, implementation of the [Installation] ICRMP has been determined not to bear on certain resource areas that frequently receive attention in NEPA analyses. Resource areas considered, but excluded from further analysis in this EA include: climate, air quality, noise, geology (except soils), infrastructure (potable water supply, electricity, wastewater treatment, steam and process heat, telecommunications, solid waste disposal, vehicular traffic), groundwater, hazardous waste site contamination and cleanup, and socioeconomic topics (except Environmental Justice and Protection of Children). Implementation of ICRMP procedures to identify and manage cultural resources will have no effect on these resource areas.

Due to their make-up and the locations in which they are generally found, cultural resources are more likely to impact or be impacted by management activities carried out for a select number of resource areas, to include land use, soils, surface water, biological resources, environmental justice and protection of children issues. Historic buildings, archeological sites, and Native American traditional cultural properties (TCP) are commonly found on installation lands. Physical measures carried out to identify, evaluate, or protect historic buildings, archeological sites, and TCPs have the potential to impact land use, soils, surface water, biological resources, environmental justice, and protection of children issues. Conversely, activities carried out to manage these resource areas have the potential to impact cultural resources. The following is an overview of these resource areas on [Installation] lands within the state of [insert State].

4.2 PROGRAM RESOURCE AREAS

4.2.1 LAND USE

(Write a land use description for each appropriate facility.)

Example. Facility A is located in (name of) County, (name of state) and occupies an area of approximately 3.5 acres. This facility is an [Installation] Training Center that is utilized by [INSTALLATION] units from (name of State). Active Army and Army National Guard units may also train at Facility A on a frequent basis. Approximately 1.0 acres of the Facility are used as firing ranges and impact areas, while nearly 1.5 acres make up the administrative area. The remaining 1.0 acres are utilized for troop maneuver and training.

The administrative area is located in the southwest corner of Facility A. An impact area for small arms (pistol) fire is located in the center of the facility. Firing points for small arms are located immediately adjacent to the impact

area. The remainder of the Facility is divided into two blocks of varying sizes and is used for routine training exercises involving [INSTALLATION] infantry and mechanized units.

Facility B is located in (name of) County, (name of state) and occupies an area of 5,000 acres. Facility B is an [INSTALLATION] Training Area and is used predominately by [Installation] personnel from (name of state). Administrative, instruction, and vehicle maintenance buildings for Facility B are located in the northwest corner of the Facility on approximately 10 acres of land. Approximately 1,000 acres of Facility land are utilized for small arms firing ranges. The remaining 3,990 acres are used for the routine training of infantry and mechanized units. Wheeled and tracked vehicles are restricted to established roadways at Facility B. Artillery and tank main gun systems cannot be fired at Facility B.

4.2.2 SOILS

(Discuss soils at each appropriate facility.)

Example The upland soil types at Facility A consist predominately of nearly impervious clay soils overlain generally by a very thin humus zone. In some upland areas the clay soils have been exposed by poor farming methods practiced before the [INSTALLATION] acquired the Facility lands and subsequent erosion caused by [INSTALLATION] training exercises. Bottomland soils generally consist of heavy silt loams up to 24 inches deep. According to soil surveys conducted for this portion of (name of) County, nearly 25 soil series occur at Facility A.

Soils at Facility B consist almost entirely of friable silt loams that are 6 to 12 inches thick, overlying heavy clay soil strata. Soils at Facility B developed residually from parent materials that were deposited by water or wind. Soil surveys conducted for this area of (name of) County found that approximately 10 soil series occur on Facility B. Although most of Facility B was farmed before acquisition by the [INSTALLATION], very little erosion and resultant deflation of the original soil strata appears to have taken place.

4.2.3 SURFACE WATER

(Discuss surface water at each appropriate facility.)

Example Facility A is predominately drained by two named streams, Mill Run and George Creek, with numerous unnamed tributary streams feeding into these water sources. Mill Run has its origin outside the northwestern border of the facility and drains to the southeast. George Creek has its origin outside the northeast border of the facility and it also drains to the southeast. Both of these streams flow into the Wildcat River, which is located approximately five miles south of Facility A.

Facility B is drained by Smith Creek which runs diagonally across the facility, flowing from the northeast to the southwest. A number of small, unnamed, intermittent streams flow into Smith as it traverses Facility B.

4.2.4 BIOLOGICAL RESOURCES

(Discuss biological resources at each appropriate facility: vegetation, wildlife, and rare, threatened, and endangered species.)

Example Vegetation. Facility A is located in the Oak-Hickory Section of the Eastern Woodlands biotic province. A total of 233 plants species from 178 genera and 59 families have been collected from the vicinity of the Facility by past biological surveys conducted by the University of (name of state). General vegetation types at facility A consist of mixed hardwood forest with oak and hickory trees predominating. Open grasslands exist mainly in the impact area where high explosive shell-fire and frequent fires have suppressed the growth of woody plants.

Facility B is situated in the Pine Belt of the Eastern Woodlands biotic province. The longleaf pine (*Pinus palustris*) is the predominate tree species found in the upland areas of the facility, while hardwoods such as the yellow poplar (*Liriodendron tulipera*) and sweet gum (*Liquidambar styraciflua*) occur most frequently in the low areas bordering Smith Creek and its tributaries.

Wildlife. Inventories conducted for Facility A have identified numerous fish and wildlife species. Typical mammalian species include the bobcat (*Lynx rufus*), mink (*Mustela vison*), white-tailed deer (*Sylvalagus floridanus*), and gray fox (*Urocyon cinereoargenteus*).

Nearly 70 species of birds have been recorded for this area of (name of state). Some of the more common which have been noted to occur on Facility A include the wood duck (*Aix sponsa*), green heron (*Butorides striatus*), and wild turkey (*Meleagris gallopavo*).

Over 40 species of reptiles and amphibians have been identified on Facility A. Some of these species include the southern copperhead (*Agkistrodon c. contortrix*), box turtle (*Terrapene c. carolina*), and bronze frog (*Rana c. clamitans*).

Approximately 33 fish species have been identified in the ponds and streams on Facility A. The most frequently observed include the chain pickerel (*Esox niger*), channel catfish (*Ictalurus punctatus*), and black crappie (*Pomoxis nigromaculatus*).

With the exception of the red-cockaded woodpecker, wildlife inventories conducted for Facility B have identified nearly the same assemblage of common wildlife species as were found at Facility A.

Rare, Threatened, and Endangered Species. Facility A possesses no federally listed threatened or endangered species. Facility B, however, has identified the red-cockaded woodpecker as being present on Facility lands. Surveys have found that an area in the northwest corner of Facility B (approximately 5 acres) possesses either cavity trees where

the red-cockaded woodpecker is known to nest in trees suitable for use as nesting sites.

4.2.5 CULTURAL RESOURCES

(Summarize cultural resource programs at each appropriate facility, including historic properties, cultural items, archeological resources, sacred sites and collections.)

Example The [Installation] is responsible for managing cultural resources on [insert number] facilities within the state of [insert State]. Facilities A, B, and consisting of approximately 11,528 (aggregate), acres of land and 150 buildings and structures (6 at Facility A, 5 at Facility B, etc.). At this time, known cultural resources on lands owned by or under the control of the [Installation] within the state of [insert State] include 100 archaeological sites at (Facility A, 10 sites at Facility B, 1 site at Facility M, etc.). Six National Register eligible buildings and structures have been identified at Facility A, while prior inventories have identified none for Facility B. No traditional cultural properties or sacred sites are known to be present at either Facility A or B, but no concerted effort has been made to consult with Native American groups who previously lived in this area. Prior surveys have identified no National Register eligible historic objects or other cultural properties. Approximately 75 cubic feet of archeological artifacts and associated records have been compiled as a result of prior investigations conducted for Facilities A and B. These materials are curated at the University of [insert name of curation facility]. The curation facility for these materials meet the building and security standards specified in 36 CFR Part 79.

Neither Facility A nor Facility B has been entirely surveyed for archeological resources. Historic architectural inventories were conducted for each Facility [insert number] years ago (1990). However, since the 1990 survey was conducted, a number of buildings and structures at each Facility, that were not considered for eligibility in the original survey, have reached at least 50 years of age and need to be reevaluated for National Register eligibility. The Historic Preservation Plan (HPP) that was prepared for Facility A seven years ago is now outdated due to changes in Army regulations and cultural resource work that has been completed since the plan was completed. The HPP originally prepared for Facility A did not consider Native American concerns as required by NAGPRA, AIRFA, EO 13007, and Presidential Memorandum for Heads of Executive Department and Agencies dated April 29, 1994: Government to Government Relations with Native American Tribal Governments. No cultural resource management plan was ever prepared for Facility B.

The [Installation] is responsible for managing a broad range of cultural resources and complying with a suite of applicable statutes, regulations, Executive Orders, and

Presidential Memoranda. Historic preservation plans/cultural resource management plans previously prepared for [Installation] facilities do not meet the requirements of AR 200-4 and some of the more recently issued Executive Orders and Presidential Memoranda concerning cultural resources. Existing historic preservation plans/cultural resource management plans prepared for [insert State] [INSTALLATION] facilities do not utilize the integrated approach required by AR 200-4. Since the publication of AR 200-4, internal Army and [INSTALLATION] operating procedures and responsibilities have changed and previously prepared historic preservation plans/cultural resource management plans do not incorporate these changes.

4.2.6 ENVIRONMENTAL JUSTICE

On February 11, 1994, President Clinton issued Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority and Low-Income Populations*. The Executive Order is designed to focus the attention of Federal agencies on the human health and environmental conditions in minority communities and low-income communities. Environmental justice analyses are performed to identify potential disproportionately high and adverse impacts to these target populations from proposed Federal actions and to identify alternatives that might mitigate these impacts.

The Region of Influence (ROI) for this action is considered to be located solely within the boundaries of properties controlled by the [Installation] facilities within the state of [insert State]. The ICRMP for the [Installation] pertains only to the management of cultural resources located within their facility boundaries. The ICRMP has no applicability to cultural resources that are located on lands outside the boundaries of these facilities. During the development of the ICRMP, the [Installation] contacted federally recognized Native American groups that were traditionally associated, and are culturally affiliated, with the geographic areas occupied by [Installation] facilities to determine if (name the appropriate facilities), possessed TCP's of significance to these Native American groups. The ICRMP also sets up a standard operating procedure for consulting with Native American groups concerning the inadvertent discovery of burial remains and grave goods on [Installation]. Those Native American groups traditionally associated with the geographic areas occupied by [Installation] were consulted during the development of this standard operating procedure.

4.2.7 PROTECTION OF CHILDREN

Executive Order 13045 seeks to protect children from disproportionately incurring environmental health or safety risks that might arise as a result of Army policies, programs, activities and standards. (If the permanent staff has children living on the facility, discuss what efforts have been made to make it safe, e.g. covering lead-based paint, fenced yard area. Also, discuss whether the identified facilities exclude the entry of unauthorized adults and children.)

5.0 FINDINGS AND CONCLUSIONS

5.1 INTRODUCTION

This analysis is directly related to the nature of the decision being made. The [Installation] is considering the implementation of an ICRMP for the management of cultural resources on properties owned or managed by the [Installation], specifically (name the appropriate facilities) located within the state of [insert State]. This decision, alone, is not likely to result in any quantifiable, concrete, on-the-ground impacts. Rather, its effect will be realized as [Installation] headquarters and installation cultural resource managers implement its recommended procedures for internal coordination, consultation with non-Army parties, cultural resource inventory and property management recommendations. Following implementation of the ICRMP, a second level of planning and decision making will involve additional environmental review to consider on-the-ground impacts of individual projects as they are identified.

5.2 LAND USE

Preferred Alternative. Implementation of the ICRMP for [Installation] facilities within the state of [insert State] will have a beneficial effect on land use at these facilities. The ICRMP sets up procedures whereby all land use activities that have the potential to adversely affect cultural resources will be coordinated with the [Installation] cultural resource POC before such actions are undertaken. Conversely, the ICRMP requires the [Installation] cultural resource POC to coordinate with land managers before permitting any archeological activities that might have the potential to adversely affect landforms.

No Action Alternative. The no action alternative would continue existing cultural resource management practices with respect to land use. No plan now exists to ensure that the installation considers the impacts of cultural resource management activities on [Installation]-controlled land use within the State of [insert State]. Continuation of existing practices could have an adverse effect upon [Installation] land use and cultural resources.

5.3 SOILS

Preferred Alternative. Implementation of the ICRMP for [Installation] facilities within the state of [insert State] will have a beneficial effect on soils at these facilities. The ICRMP sets up standard operating procedures whereby the [Installation] cultural resource POC must identify the effects of cultural resource management activities upon other facility natural resources, including soils. In accordance with these procedures, the [Installation] cultural resource POC will coordinate any cultural resource management or investigation activities, which have the potential to erode or degrade soils, with installation land managers before these activities can be undertaken. Avoidance of significant cultural resource locations by installation troop training exercises should also have a beneficial effect on soil retention.

No Action Alternative. The no action alternative would maintain existing practices with respect to consideration of cultural resource management and its impacts on soils. No plan now exists to ensure that the installation considers the impacts of cultural resource management activities on soil. Continuation of existing practices could have an adverse effect upon soils and cultural resources.

5.4 SURFACE WATER

Preferred Alternative. Implementation of the ICRMP for [Installation] facilities will have a beneficial effect on surface water sources at these facilities. The ICRMP sets up standard operating procedures whereby all cultural resource survey and data recovery activities that have the potential to adversely affect surface water sources at [Installation] properties within the state of [insert State] will be coordinated with the [Installation] natural resource manager before being undertaken. This coordination would result in either best management practices being implemented to avoid adverse effects or appropriate permits being acquired prior to undertaking any activities that would have the potential to affect the quality of surface waters.

No Action Alternative. The no action alternative would maintain existing practices with respect to cultural resource management and its impacts on surface waters. No plan now exists to ensure that the installation considers the impacts of cultural resource management activities on surface waters. Continuation of existing practices could have an adverse effect upon surface waters and cultural resources.

5.5 BIOLOGICAL RESOURCES

Preferred Alternative. Implementation of ICRMP for [Installation] facilities will have a beneficial effect upon biological resources. The ICRMP sets up procedures whereby all cultural resource survey, data recovery, or other management activities that have the potential to adversely affect biological resources at [Installation] properties within the state of [insert State], will be coordinated with the [Installation] natural resource manager before being initiated. Special care will be taken to avoid or ameliorate those activities that have the potential to adversely impact the (name the appropriate biological resource/s and the appropriate facilities they are located at). Coordination of proposed cultural resource identification and management activities with the [Installation] natural resource manager will identify those activities that have the potential to adversely affect biological resources and would result in management practices being implemented to avoid these adverse effects.

No Action Alternative. The no action alternative would maintain existing practices with respect to cultural resource management and its impacts on biological resources. No plan now exists to ensure that the installation considers the impacts of cultural resource management activities on biological resources. Continuation of existing practices could have an adverse effect upon biological resources.

5.6 CULTURAL RESOURCES

Preferred Alternative. Implementation of the ICRMP for the [Installation] will have a beneficial effect on the management of cultural resources at [Installation] properties within the state of [insert State]. Prior to development of this plan, the [Installation] did not have an ICRMP as required by AR 200-4. In accordance with AR 200-4, the [Installation] ICRMP addresses the following requirements for [Installation] facilities:

1. Identification of all applicable legal requirements and procedures for integrating compliance between the various independent cultural resources legal requirements.
2. Identification, to the extent possible, of specific actions, projects, and undertakings projected over a five-year period that may require cultural resources legal compliance actions.
3. Development and implementation of a cultural landscape approach to installation cultural resources management and planning.
4. A planning level survey that includes existing historic contexts, and archeological sensitivity assessment or archeological predictive model, and a listing of any federally recognized Indian tribes associated with the installation.
5. A plan for the actual field inventory and evaluation of cultural resources that is prioritized according to the inventory and evaluation of cultural resources with specific [Installation] compliance requirements.
6. Internal procedures for consultation, survey, inventory, evaluation, treatment, recordation, monitoring, emergency or inadvertent discovery, and reporting tailored for the particular conditions and specific requirements at [Installation]. Interface requirements between the cultural resources management program and other program areas. Coordination processes between the [Installation] and MACOM, regulatory agencies, and the interested public.
7. Provisions for curation of collections and records (in accordance with 36 CFR 79) that are associated with NHPA undertakings.
8. Provisions for limiting the availability of cultural resource locational information for the purposes of protecting resources from damage.
9. Provisions and procedures for the conduct of an economic analysis on historic properties that are being considered for demolition and replacement.
10. Procedures to ensure that Native American tribes are provided access to sacred sites and are consulted when future access may be restricted or when adverse effects to the physical integrity of sacred sites may occur.
11. Development of standard treatment measures for cultural resources.
12. An estimate of fiscal resources required to execute the plan. This estimate is not included in the ICRMP released for public comment since the information is "For Official Use Only" and merits protection as a government cost estimate.

As a result of implementing the subject ICRMP, the [Installation] will have a well-defined and efficient plan for managing cultural

resources on [Installation] properties within the state of [insert State] for the next five years. Long-range cultural resource inventory and consultation needs are also addressed in the ICRMP, but in less detail than those actions to be undertaken in the next five years.

No Action Alternative. The no action alternative would maintain existing conditions and methodologies for the management of [Installation] cultural resources. AR 200-4 requires the preparation of an ICRMP to manage cultural resources on Army and lands. The [Installation] now has no ICRMP for the management of its cultural resources. If the [Installation] ICRMP is not implemented, the [Installation] will be out of compliance with AR 200-4. Existing cultural resource identification and management practices are considered to be inadequate and out-of-date. Continuation of existing practices would therefore have an adverse effect upon cultural resources since they would perpetuate non-compliance conditions.

5.7 ENVIRONMENTAL JUSTICE

Preferred Alternative. No impacts would be expected. Implementation of the ICRMP for the [Installation] will not have a disproportionate impact on the human health or environment of minority or low-income populations in the project area. (Summarize who permanently lives on [Installation] properties within the state of [insert State] and the people who utilize the facilities; example - With the exception of a caretaker and his family on Facility A, no permanent residents live on Facilities A or B. Small permanent staffs work at each facility on a daily basis and larger numbers of troops train there either on weekends or for two-week intervals as part of their summer training program.) The ICRMP pertains only to the management of cultural resources located within the boundaries of these two facilities and would not impact resources or persons located outside these boundaries. Additionally, while developing the [Installation] ICRMP, the [Installation] contacted Native American groups that were traditionally associated with the geographic areas occupied by (name the appropriate installation facilities) to determine if any facility possessed TCP's of significance to these Native American groups. (Summarize whether any TCPs are located on the facilities). The ICRMP also sets up a standard operating procedure for consulting with Native American groups concerning the inadvertent discovery of burial remains and grave goods on [installation].

No Action Alternative. The no action alternative would maintain existing practices with respect to consideration of cultural resource management and its impacts on environmental justice considerations. No plan now exists to ensure that the [INSTALLATION] considers the impacts of cultural resource management activities on environmental justice considerations. Although the likelihood is small, continuation of existing practices could have an adverse effect upon low-income or minority populations.

5.8 PROTECTION OF CHILDREN

Preferred Alternative. No impacts would be expected. (Summarize whether precautions have been taken for any children permanently located on the appropriate facilities).

No Action Alternative. The no action alternative would maintain existing conditions with respect to consideration of cultural resource management and its impacts on children. No plan now exists to ensure that the [INSTALLATION] considers the impacts of cultural resource management activities could have on children. Although the likelihood is small, maintenance of existing conditions could have an adverse effect upon children.

5.9 CUMULATIVE IMPACTS

A cumulative impact is defined as an effect on the environment that results from the incremental effect of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

The [Installation] ICRMP will apply only to the management of cultural resources within the boundaries of [Installation] properties within the state of [insert State] The ICRMP will set up procedures for the efficient inventory and management of cultural resources on [INSTALLATION] lands. Archeological surveys and inventories of Native American TCPs have only been conducted on a sporadic basis for non-Federal lands in the vicinity of (name the appropriate facilities). Generally these surveys have been conducted as a requirement of federally sponsored, funded, licensed, or permitted projects. No such projects are known to be scheduled for privately owned lands in the vicinity of (name the appropriate facilities). However, if such projects occur in the future, the information that they will add to the regional database about the location of archeological and Native American TCPs can be considered to have a beneficial cumulative effect.

5.10 MITIGATION MEASURES

Mitigation generally includes avoiding an effect altogether by stopping or modifying an action, minimizing an effect by limiting the degree or magnitude of an action and the activities associated with its implementation, and rectifying an effect by repairing, rehabilitating, or restoring the affected environment. Mitigation may also involve reducing or eliminating an effect over time by preservation and maintenance operations during the life of an action or compensating for an effect by replacing or providing substitute resources or environments.

No mitigation measures will be required as a result of implementing the ICRMP for. Implementation of the ICRMP is predominately a management decision that will not of itself cause any negative impacts to [INSTALLATION] cultural or natural resources. Adoption of the ICRMP will result in better protective measures for

[INSTALLATION] cultural resources and will cause [INSTALLATION] cultural resource managers to consider the effects of their actions upon other installation-controlled natural resources. Individual projects undertaken at a later date in compliance with the procedures outlined in the ICRMP may result in actions that could require mitigation measures. Appropriate mitigation measures will be identified and implemented at that time as warranted.

5.11 CONCLUSIONS

Based upon the analyses contained in this EA, it has been determined that the known and potential impacts of the proposed action on the physical, natural, and cultural environment would be of a positive nature. Implementation of the [Installation] ICRMP would result in the efficient management of cultural resources at [Installation] facilities. The ICRMP establishes explicit responsibilities, standard operating procedures, and long-range goals for managing cultural resources on [Installation] lands in compliance with all applicable federal laws, regulations, Executive Orders, Presidential Memoranda, and [INSTALLATION] guidelines. Standard Operating Procedures included in the ICRMP require close interaction between the [INSTALLATION] cultural resource manager and other [INSTALLATION] offices. Therefore, cultural, natural, and human resources under [Installation] control will receive consideration and protection than previously afforded. Implementation of the proposed action would not result in significant environmental effects.

Based upon the foregoing findings and conclusions, issue of a Finding of No Significant Impact would be appropriate. Preparation of an EIS is not required prior to implementation of the proposed action.

6.0 AGENCIES AND PERSONS CONSULTED

7.0 LIST OF PREPARERS

8.0 REFERENCES

APPENDICES

FINDING OF NO SIGNIFICANT IMPACT

IMPLEMENTATION OF AN INTEGRATED CULTURAL RESOURCE MANAGEMENT PLAN FOR [Installation] FACILITIES WITHIN THE STATE OF [INSERT STATE]

Pursuant to the Council on Environmental Quality Regulations (40 CFR Parts 1500-1508) for implementing the procedural provisions of the National Environmental Policy Act (42 U.S.C. 4321 et seq.) and Army Regulation 200-2 (Environmental Effects of Army Actions), the [Installation] has conducted a EA of the potential environmental and socioeconomic effects associated with the implementation of an ICRMP for [Installation] properties within the state of [insert State].

The [Installation] proposes to implement an ICRMP for [Installation] properties within the state of [insert State]. Following its implementation, the ICRMP will be used to ensure compliance with all applicable cultural resource management legal requirements including Federal statutes, regulations, Executive Orders, Presidential Memoranda, and NGB guidelines. The ICRMP will set out procedures to integrate these legal compliance requirements into the day-to-day operational procedures of the [Installation] headquarters and its subordinate facilities. The ICRMP will be used to identify both internal and external [MACOM] coordination procedures to deal with cultural resource issues and the appropriate roles and responsibilities of [MACOM] personnel in the management of cultural resources.

The "No Action Alternative" is the only alternative to the proposed action considered in this EA and serves as a benchmark against which the proposed action was evaluated. For this analysis, the status quo involved the management of cultural resources at (name the appropriate facilities) under existing [Installation] procedures. Continuation of existing conditions was not considered to be a feasible alternative since the [INSTALLATION] has a regulatory requirement to prepare an ICRMP (AR 200-4) and comply with all applicable cultural resource laws, regulations, Executive Orders, Presidential Memoranda, and is not fully meeting its cultural resource requirements.

The EA, which is incorporated into this Finding of No Significant Impact, examines potential effects of the proposed action and no action alternatives on resources and areas of environmental concern that could be affected by implementation of the ICRMP. These include land use, soils, surface water, biological resources, cultural resources, environmental justice, and protection of children. Resource areas considered during the analysis, but not determined to be applicable to the implementation of an ICRMP include climate, air quality, noise, geology (except soils), infrastructure (potable water supply, electricity, wastewater treatment, steam and process heat, telecommunications, solid waste disposal, vehicular traffic), groundwater, hazardous waste site contamination and cleanup, and socioeconomic topics (except Environmental Justice and Protection of Children).

The analysis determined that only beneficial effects on affected resource areas and areas of environmental concern would result from implementation of the ICRMP. Implementation of the [Installation] ICRMP would result in enhanced stewardship and more efficient

management of cultural resources at [Installation] facilities. The ICRMP establishes explicit responsibilities, standard operating procedures, and long-range goals for managing cultural resources on [INSTALLATION] lands in compliance with all applicable Federal laws, regulations, Executive Orders, Presidential Memoranda, and guidelines. Standard Operating Procedures included in the ICRMP require close interaction between the [INSTALLATION] cultural resources program manager and other [INSTALLATION] offices. Adoption of the ICRMP will result in appropriate protective measures for [INSTALLATION] cultural resources and will cause [INSTALLATION] cultural resource managers to consider the effects of their actions upon other facility natural resources. There would also be beneficial cumulative impacts from the implementation of the ICRMP.

No mitigation measures will be required as a result of implementing the ICRMP for [Installation] properties within the state of [insert State]. Implementation of the ICRMP is predominately a management decision that will not of itself cause any negative impacts to [INSTALLATION] cultural or natural resources. Individual projects undertaken at a later date in compliance with the procedures outlined in the ICRMP may result in actions that could require mitigation measures. Appropriate mitigation measures will be identified and implemented at that time as warranted.

Based upon the EA, it has been determined that implementation of the proposed action would have no significant or cumulative impacts on the quality of the natural or human environment. Because there would be no significant environmental impacts resulting from implementation of the proposed action, an Environmental Impact Statement is not required and will not be prepared.

The [INSTALLATION] plans to initiate this proposed action 30 days from the execution of this Finding of No Significant Impact. Copies of the EA may be obtained by contacting the [Installation], [insert installation military address], ATTN: (name of installation point of contact), [insert installation mailing address].

Date: _____

(Name of signatory)
(Title of signatory)